

**DECLARATION OF  
VINEET KAHLON  
ISO GOOGLE LLC'S  
RESPONSE TO THE  
COURT'S 10/27/22  
ORDER TO SHOW  
CAUSE (DKT. 784)**

**Redacted Version of  
Document Sought to  
be Sealed**

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION**

CHASOM BROWN, et al., individually and  
on behalf of all similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF VINEET KAHLON**

1. I am a Senior Staff Software Engineer and a team lead for Google's Controls, Privacy, and Regulation team. I have also worked on Google's Ad Manager Serving team for more than two years, and I have worked on Google's Sell-Side Quality Team for more than eight years. In these roles, I am one of the lead engineers for Google's [REDACTED] project, and I regularly work with [REDACTED] logs in the course of my day-to-day responsibilities. I have been employed at Google since April of 2014. I make this declaration of my own personal, firsthand knowledge, and if called as a witness, I could and would testify competently thereto.

2. I understand that Google served a declaration of Martin Šrámek in the above-captioned litigation on June 14, 2022, which identified among other logs, the following [REDACTED] logs that contain the "maybe\_chrome\_incognito" bit:

- [REDACTED]
- [REDACTED]
- [REDACTED]

3. The [REDACTED] has a corresponding p-log version: [REDACTED]  
[REDACTED], which also contains the "maybe\_chrome\_incognito" bit.

4. [REDACTED] is also referred to by the code name "Turtledove" within Google. [REDACTED]  
[REDACTED]. Attached hereto

1 as Exhibits A, B, and C are documents that I understand have been produced in the above-  
2 captioned litigation with the Bates numbers GOOG-CABR-04430230, GOOG-CABR-04416113,  
3 and GOOG-CABR-04737037, respectively. I am familiar with these documents and helped  
4 prepare them in the course of my day-to-day work at Google. Exhibits A through C describe the  
5 proposed [REDACTED] framework in detail. Extensive documentation regarding Google's proposed  
6 TurtleDove framework is also publicly available at <https://github.com/WICG/turtledove>.  
7 "TurtleDove is [a] proposal for remarketing & custom cross-site audience cohort without 3-p  
8 cookies from Chrome." Ex. A at -232. TurtleDove is "an API for allowing ads targeted at an  
9 advertiser-created audience, to replace targeting a campaign at a list of cookies." Ex. B at -113. If  
10 TurtleDove were implemented, "[t]he fact that a particular person is in the target audience [would]  
11 only [be] known to that person's browser, and a person c[ould] only be added to an audience by  
12 running javascript code in their browser." *Id.* In lieu of cookies, "[s]howing ads to the people in  
13 the audience would involve ad tech adopting a new in-browser auction." *Id.*

14 5. A [REDACTED] log is an [REDACTED]  
15 [REDACTED]. [REDACTED] logs take the underlying information  
16 from [REDACTED] or [REDACTED], and then write information with  
17 different ad spec information that would be used if [REDACTED] were implemented (*i.e.*, if the  
18 TurtleDove API and ad tech changes discussed in Exhibit B were used in lieu of cookies). These  
19 logs are used to evaluate how certain ad serving features would behave if the [REDACTED] framework  
20 were in place. This type of analysis is typical of the scientific method, as it involves comparing  
21 data from [REDACTED] or [REDACTED] (the "control group") with  
22 the [REDACTED] logs (the "experimental group").

23 6. These [REDACTED] logs do not record any further action from the user (*e.g.*, views,  
24 interactions, or clicks) that is not already recorded in the corresponding [REDACTED] or  
25 [REDACTED] logs. Thus, the only event-level browsing data in these [REDACTED]  
26 logs (including the "maybe\_chrome\_incognito" field) is duplicated directly from the [REDACTED]  
27 [REDACTED] or [REDACTED] logs. The information recorded in these [REDACTED]  
28 logs that is in addition to the information recorded in the [REDACTED] or [REDACTED]

1 [REDACTED] logs relates to a given [REDACTED] experiment. This additional information  
2 consists of the experimental framework information referenced above in paragraphs 4 and 5, which  
3 is provided by the Google team or teams responsible for a given experiment. None of the additional  
4 information recorded in these [REDACTED] logs reflects actual user information.

5 7. Before being contacted by counsel for purposes of this declaration, I was not aware  
6 of the “maybe\_chrome\_incognito” bit or any other bit that purports to estimate Chrome Incognito  
7 status. The maybe\_chrome\_incognito bit is recorded in the [REDACTED] logs identified in paragraphs  
8 2 and 3 above only because the [REDACTED] logs take wholesale the fields from the [REDACTED] logs.  
9 As such, when the maybe\_chrome\_incognito bit was added to the [REDACTED] or  
10 [REDACTED] logs previously identified by Google, it was copied to each of the  
11 [REDACTED] logs identified in paragraphs 2 and 3 above.

12 8. The [REDACTED] logs identified in paragraphs 2 and 3 above have not been used to  
13 perform analysis specifically directed at Incognito browsing.

14  
15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed on the 30th day of November 2022 at Princeton, New Jersey.

17  
18 By: DocuSigned by:  
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21 Vineet Kahlon  
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